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To: FMC.Maritime(secretary)
Date: Thu, Sep 6, 2001 6:01 AM
Subject: Docket 01-08: Comments of P&O Nedlloyd

Attached for your review are the comments of P&O Nedlloyd in response to the NOI of July 10, 2001.

Regards
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CC: FMC.FMC-SMTP("P.COLEMAN@ponl.com")

Comments of P&O Nedlloyd in response to the Federal Maritime Commission Notice of Inquiry dated July 10, 2001.
Docket No. 01-08

Question 1: Usage of FMC Forms

The only form currently used by P&O Nedlloyd on an occasional basis is FMC Form -1, Organizational Information. In that the form is informational in nature, there is a low degree of sensitivity.

When required, this form is filed as a hard copy. While we would prefer to file electronically, the form is straightforward, seldom needed, thus hard copy filing is not a burden. This form does not require a signature.

Question 2: Plans for Electronic Signature Technology

P&O Nedlloyd does use a form of electronic signature for bills of lading which are produced on customers' premises as part of our E-Commerce initiative. In this instance the signature is part of a pdf B/L file sent to the customer utilizing our remote B/L facility. This method does not electronically identify or authenticate the person sending the message, but it is an integral part of the pdf file, cannot be saved or changed, and is acceptable to banks involved in the trade documentation process.

We would also favor use of such signature technology for service contracts and amendments and would encourage its approval for that purpose.

Question 3: Familiarity with Public Key Infrastructure and Automated Certificates of Electronic Signature

P&O Nedlloyd staff are familiar with Public Key Infrastructure and Automated Certificates of Electronic Signatures but such methods are not currently in use in the Company. We are aware of ongoing discussions about such technology and encourage its development with the caveat that international agreement on standards and usage are critical.

Question 4: Benefits

In that we file limited forms with the Commission, we will not be impacted specifically by adoption of electronic options. We do encourage their usage, however, as an overdue means of streamlining the business process.

Questions 5,6,7: Risks, Obstacles, Barriers and Concerns

Given the limited required reporting, P&O Nedlloyd sees no risks, obstacles or barriers to the establishment of electronic options.

Question 8: Other Comments

P&O Nedlloyd encourages the further development of electronic transactions in all aspects of the ocean shipping industry. The Company has devoted considerable effort to the expansion of E-Commerce as evidenced by our founding role in the INTTRA portal, the growing usage of our website, PONL.com, and expanding usage of EDI in our relationships with customers, vendors and alliance partners. The increasing acceptance of such initiatives bears witness to the future direction of electronic transactions in international commerce.